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Serene, LLC

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Mercedes Sanchez,

Plaintiff,

vs.

R.W. Selby & Company, Inc. d/b/a Rancho Serene  
Apartments; Rancho Serene, LLC; Doe Property  
Manager 1; Doe Maintenance Company 1; Does 1-20  
and Roe Business Entities 1-20, inclusive

Defendants.

Case No.: 2:20-cv-2357

**R.W. Selby & Company, Inc. &  
Rancho Serene, LLC's Petition for  
Removal**

R.W. Selby & Company, Inc. & Rancho Serene, LLC petition to remove this case to the United States District Court for the District of Nevada from the Eighth Judicial District Court for the State of Nevada. This petition for removal is signed per Rule 11.

Removal is appropriate per 28 U.S.C. § 1441 because diversity jurisdiction is present per 28 U.S.C. 1332. Plaintiff alleges she is a resident of Nevada.<sup>1</sup> R.W. Selby & Company, Inc. is a California corporation with its principal place of business in California. Rancho Serene, LLC's members are divided into two groups. The non-managing member group are all individuals or trusts who are all citizens of California. The managing member is Rancho25, LLC. Rancho25's members are all individuals or trusts who are all citizens of California.

On October 25, 2020, Plaintiff filed her complaint in state court alleging injury from a slip and fall occurring on January 1, 2019.<sup>2</sup> On December 14, 2020, Plaintiff moved to exempt the case

<sup>1</sup> ECF No. 1-2 at ¶ 1.

<sup>2</sup> ECF No. 1-2.

1 from the Eighth Judicial District Court's arbitration program and asserted \$84,876.85 in medical  
2 specials due to her fall.<sup>3</sup> This was Defendants' first indication that the amount in controversy  
3 exceeds \$75,000.

4 Defendants timely petitioned for removal within 30 days of being served of notice that the  
5 amount in controversy exceeds \$75,000. Attached to this petition are copies of all process,  
6 pleadings, and orders served upon them in the state court action.

7 DATED this 31<sup>st</sup> day of December, 2020.



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11 BY: /s/ Michael Lowry  
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18 Serene, LLC  
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<sup>3</sup> ECF No. 1-5 at 2.

**Certificate of Service**

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on December 31, 2020, I served **R.W. Selby & Company, Inc. & Rancho Serene, LLC's Petition for Removal** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

Alison M. Brasier Hicks & Brasier 2630 S. Jones Blvd Las Vegas, Nevada 89146 Attorneys for Mercedes Sanchez	
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BY: /s/ Michael Lowry  
An Employee of

